

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET  
FOR THE PERIOD JULY 1 TO JULY 31, 2023

Debtor: LTL Management LLC

Applicant: **Blake, Cassels & Graydon LLP**

Case No.: 23-12825-MBK

Client: LTL Management LLC (“LTL”)

Chapter: 11

Case Filed: April 4, 2023 (the “Petition Date”)

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SECTION 1  
FEE SUMMARY

☐ Interim Fee Application No. \_\_\_\_\_ or ☐ Final Fee Application

Summary of Amounts Requested for the Period from July 1 to 31, 2023 (the “Fourth Statement Period”).

	CAD
Total Fees:	\$22,433.20
Total Disbursements:	\$0.00
Total Fees and Disbursements:	\$21,798.20
Minus 20% Holdback of Fees:	(\$4,86.64)
Amount Sought at this Time:	<b>\$17,946.56</b>

	<u>FEES</u>	<u>EXPENSES</u>
Total Previously Requested:	\$266,071.10	\$1,260.00
Total Allowed to Date:	\$0.00	\$0.00
Total Retainer (If Applicable) <sup>1</sup> :		
Total Holdback (If Applicable):	(\$53,214.22)	\$0.00
Total Received by Applicant <sup>2</sup> :	\$0.00	\$0.00

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<sup>1</sup> Reconciliation of the pre-dismissal amounts and post-dismissal amounts received from LTL will be provided in Blakes’ Final Fee Application.

<sup>2</sup> Payment of the permitted 80% of fees and 100% of disbursements is anticipated to be deducted from the pre-dismissal amounts and post-dismissal amounts, to the extent any such amounts are available, once the objection period for the relevant monthly fee statement has expired.

<b>Name of Professional &amp; Title</b>	<b>Year Admitted</b>	<b>Hours</b>	<b>Rate (CAD)</b>	<b>Fees (CAD)</b>
Gordon McKee Partner, Litigation & Dispute Resolution (Toronto)	1988	4.4	\$1,070.00	\$4,708.00
Linc Rogers Partner, Restructuring & Insolvency (Toronto)	2000	10.6	\$913.00	\$9,677.80
Jessica Lam Partner, Litigation & Dispute Resolution (Toronto)	2014	.2	\$749	\$149.80
Caitlin McIntyre Associate, Restructuring & Insolvency (Toronto)	2017	10.3	\$664.00	\$6,839.20
Nancy Thompson Law Clerk, Restructuring & Insolvency (Toronto)	N/A	2.8	\$378.00	\$1,058.40

<b>Blended Hourly Rate:</b> [Excluding Nancy Thompson and Filing Clerks]				<b>\$838.23</b>
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**SECTION II  
SUMMARY OF SERVICES**

SERVICES RENDERED	HOURS	FEES (CAD)
1. <b>Litigation Consulting: CCAA Recognition Proceeding</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	24.9	\$20,827.00
2. <b>Fee and Retention Application</b> Preparation of employment and fee applications for self or others; motions to establish interim procedures	3.4	\$1,606.20
3. <b>Litigation: Canadian Actions</b> Other than Avoidance Action Litigation		
8. <b>Litigation: General / All Class Actions</b> Other than Avoidance Action Litigation		
<b>SERVICE TOTALS:</b>	<b>28.3</b>	<b>\$22,433.20</b>

*Note: Fees for No. 3 are allocated 33.33% to LTL and 66.67% to J&J, which allocation is reflected in the breakdown of amounts set out on page 1*

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>Matter No.</b>	<b>DISBURSEMENTS</b>	<b>AMOUNT (CAD)</b>
	N/A	
	<b>DISBURSEMENTS TOTALS</b>	

*Note: Disbursements for matter No. 3 are allocated 33.33% to LTL and 66.67% to J&J, which allocation is reflected in the breakdown of amounts set out on page 1*

**SECTION IV  
CASE HISTORY**

1. Date of Retention: June 15, 2023, effective as of the Petition Date [Dkt. 791] (the “Retention Order”).<sup>3</sup>
2. Summary explaining the nature of the work performed and the results achieved:
  - Monitoring the Chapter 11 proceeding, and considering impact on the CCAA recognition proceeding;
  - Communication with plaintiff counsel regarding talc-related matters and the CCAA stay;
  - Reviewing bar date motion, considering impact on the CCAA recognition proceeding and related communication with the Information Officer;
  - Reviewing the draft plan and disclosure statement, considering the impact on the CCAA recognition proceeding, and related communication with the Information Officer;
  - Reviewing correspondence from counsel to the TCC and considering response;
  - Reviewing dismissal decision and related communication with the Information Officer; and
  - Preparing and finalizing monthly fee statements.

I certify under penalty of perjury that the above is true.

Date: August 31, 2023

/s/ Linc Rogers

Linc Rogers

**Blake, Cassels & Graydon LLP**

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<sup>3</sup> The Retention Order is attached hereto as Exhibit A.